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## CAMPBELL & LEVINE, LLC

Attorneys at Law

May 26, 2022

The Honorable Ashley M. Chan  
United States Bankruptcy Judge  
824 Market Street North, 3<sup>rd</sup> Floor  
Wilmington, DE 19801

Re: In re: W.R. Grace & Co., et al., Reorganized Debtors  
Chapter 11 - Case No. 01-1139 (AMC)  
Motion filed by Autry Earl Barney at Docket No. 33293

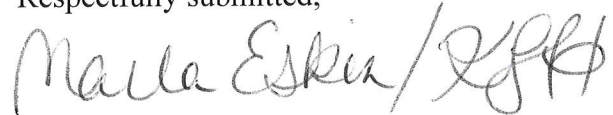
Dear Judge Chan:

This firm represents the WRG Asbestos PI Trust (the "Trust"). We are in receipt of the "*Movant Order Motion for Settlement Relief*" (the "Motion"), filed by Autry Earl Barney on May 10, 2022 at docket number 33293. We are also in receipt of the "*Amended Notice of Telephonic Status Hearing on June 14, 2022 at 12:00pm*" (the "Hearing"), filed at docket number 929649.

We are writing to confirm that Mr. Barney has submitted a claim with the Trust (the "Claim"). The Claim was timely reviewed pursuant to the WRG Asbestos PI Trust Distribution Procedures (the "TDP"). On December 9, 2020, based upon that initial review, a letter was sent to Mr. Barney advising that certain sections of the Proof of Claim Form were not completed, and explaining why the Claim is deficient. Since that time, this firm has engaged in numerous rounds of correspondence with Mr. Barney concerning the deficiencies of the Claim, how said deficiencies may be cured, and how Mr. Barney may institute Alternative Dispute Resolution ("ADR") of the Trust's denial of the Claim pursuant to the Trust's ADR Procedures.

The undersigned plans to participate in the Hearing and will be available to address any questions from Your Honor.

Respectfully submitted,



Marla. R. Eskin

MRE/smc

cc: Mr. Autry Earl Barney (Via Federal Express)